

*REMARKS/ARGUMENTS*

Applicants thank the Examiner for the careful search and consideration reflected in the current Office Action. Applicants have read and understood the rejections, and respectfully submit the following remarks for consideration. In view of these remarks, favorable reconsideration of the claims is respectfully requested.

Claims 1, 2, 4, 5, 7-9, 11-15, 17, and 19 are presently pending. Of these claims 1, 8, 12, and 17 are independent. Each of these independent claims was rejected under 35 U.S.C. 103(a) as being unpatentable over a combination of new references, namely Sholdander (US 7,177,295) and Larsson (US 2004/0233918). Because the independent claims are believed to patentable over the cited references, these remarks will focus on those claims, with the understanding that each dependent claim is patentable for at least the reasons noted with respect to its parent claim.

**Claim 1**

Claim 1, which is reproduced below for ease of reference, is a fairly narrow claim related to packet forwarding.

1. A method for information dissemination in a wireless mobile ad hoc network comprising:

receiving a request to communicate information from a source node to a destination;

identifying each neighbor node of the source node in the ad hoc network;

invoking a proactive border node broadcast protocol at the source node when the destination is a neighbor node and wherein the number of hops to the destination is less than a predetermined number of hops;

invoking an on-demand border node broadcast protocol at the source node when the number of hops from the source node to the destination exceeds the predetermined number; and

communicating the information from the source node based on the invoked broadcast protocol by:

**selecting at least one neighbor node as a border node based on a geographic location of the neighbor node and geometric criteria by determining at least one neighbor node having both a maximum distance**

**from the source node and a minimum distance to a one of the compass point directions North, South East and West;** and

broadcasting the information from the source node, wherein the broadcast information identifies the selected at least one border node and a communication destination.

In addition to its other limitations, it can be seen that claim 1 expressly requires selecting a border node by determining a neighbor node “having both a maximum distance from the source node and a minimum distance to one of the compass point directions North, South East and West.” This is a very specific recitation that does not appear in any form in any cited reference.

The Action cites the Larrison reference as teaching this feature. However, Larrison contains no such teaching. In fact, Larrison teaches a technique that launches packets in the generally correct direction without any consideration whatsoever of the target nodes proximity to one of the four primary compass points. See, for example, Larrison at the end of paragraph 96:

From FIG. 4B, it can be seen that packet PCK Y is destined for a destination in a completely different direction than packet PCK X. In this direction, there is a relay node 200 that gives an **absolute maximum forward progress**, close to the transmit range of the transmitting node 100. From a forward progress point of view, it is **thus clearly more advantageous to transmit packet PCK Y** than PCK X.

From this passage, it is quite clear that Larrison considers “maximum forward progress,” *not* the four compass points, when sending packets.

As further evidence, Applicants have performed a computer search of the Larrison reference; Larrison *does not once* use any of the words “East”, “West”, “North”, “South”, “compass”, or even “minimum”. Even from this data point alone, it seems pretty clear that Larrison cannot possibly teach the limitation in question.

Thus, Larrison wholly fails to teach or even imply a very significant limitation of the claimed technique, and the other references of record do not solve this shortcoming. As such, favorable reconsideration of claim 1 is respectfully requested.

**Claims 8, 12, and 17**

Claims 8, 12, and 17 are similar to claim 1 in that they, too, require selecting a border node by determining a neighbor node “having both a maximum distance from the source node and a minimum distance to a one of the compass point directions North, South, East and West.” As noted above, this limitation is not taught or implied by any reference of record, and favorable reconsideration of claims 8, 12, and 17 is respectfully requested.

**The Dependent Claims**

As noted above, each dependent claim is patentable for at least the reasons noted with respect to its parent claim. As such, favorable reconsideration of claims 2, 4, 5, 7, 9, 11, 13-15, and 19 is respectfully requested.

**Conclusion**

It is respectfully submitted that the pending claims are allowable, and the Examiner is requested to pass the case to issuance. If a telephone conference would expedite the prosecution of the subject application, the Examiner is urged to call the undersigned attorney.

Respectfully submitted,

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